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NEW YORK, NY
EAST MEADOW, NY
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ROCHESTER, NY
STAMFORD, CT

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Regina Lewis v. Dr. Renata Krymkevich, et al., 07-CV-4853 (CM)(GAY)
MCB File No. 22-80346

Dear Judge McMahon:

MEMO ENDORSED

We represent defendant Dr. Renata Krymkevich in the above-referenced action. We write to respectfully request a three-week extension of this defendant's deadline to oppose plaintiff's motion to vacate the Court's Order dated December 17, 2009, which, inter alia, dismissed plaintiff's claims against Dr. Renata Krymkevich, to February 11, 2020.

Plaintiff's motion was docketed on January 6, 2020. See dkt. No. 114. Accordingly, Dr. Krymkevich's opposition is due January 21, 2020 (January 20, 2020 is Martin Luther King Day, a federal holiday). As plaintiff's motion was brought eleven years after the dismissal of her claims, we require additional time to retrieve and review the file, analyze plaintiff's legal contentions, and discuss the matter with our client to formulate our position. Further, I will be away on vacation during the Martin Luther King Day holiday weekend.

On January 14, 2020 and January 15, 2020, I called plaintiff multiple times at the telephone number listed on the docket to request her consent to this extension request. On all occasions the line was busy. Thus, I have not been able to ascertain whether plaintiff consents to this request. This is the first request for an extension of this deadline. If granted, this extension will not affect any our Court-scheduled dates.

Accordingly, we request that defendant Dr. Krymkevich's deadline to oppose plaintiff's motion be extended to February 11, 2020.

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Copies mailed/faxed/handed to counsel on 1/16/2020

regarding you & respond. So stand down
stand down
process
process

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We thank the Court for its consideration of this request.

Respectfully submitted,

MARTIN CLEARWATER & BELL LLP

s/

Evan R. Schnittman

cc: **BY REGULAR MAIL**

Ms. Regina Lewis
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BY ECF

All other parties of record